

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JUDY LEVIN,

Plaintiff,

v.

E.I. DUPONT DE NEMOURS & COMPANY,

Defendant.

C.A. No: 05-11618-WGY

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Local Rule 83.5.3, the undersigned counsel, Theodore M. Hess-Mahan, hereby moves that this Court enter an Order granting leave to Alan J. Kruger, Stuart R. Silver and Steve I. Silverman, of the law firm of Kluger, Peretz, Kaplan & Berlin, P.L., 201 So. Biscayne Blvd., Suite 1700, Miami, FL 33131, Tel. (305) 379-9000, Facsimile (305) 379-3428, to appear on behalf of the plaintiff and practice before this Court in the above-captioned action.

As grounds for this motion, the undersigned represents the following:

1. Alan J. Kruger is and has been a member in good standing of the bars of the State of Florida and the State of New York since 1975. In addition, Mr. Kluger has also been admitted to practice in the following jurisdictions in the years indicated: United States District Court for the Southern District of Florida (1976), the United States Court of Appeals for the Third Circuit (1994), Fifth Circuit (1975), Ninth Circuit (1997) and Eleventh Circuit (1981), the United States Supreme Court (1979), and the United States Tax Court (1982).

2. There are no disciplinary proceedings pending against Mr. Kluger as a member of the bar in any jurisdiction.

3. Mr. Kluger has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

4. In further support of this motion, Mr. Kluger has submitted herewith his Certificate of Good Standing as Required by Local Rule 83.5.3.

5. Stuart R. Silver is and has been a member in good standing of the bar of the State of Florida since 1974. In addition, Mr. Silver has also been admitted to practice in the following jurisdictions in the years indicated: United States District Court for the Southern District of Florida (1974), the United States Court of Appeals for the Fifth Circuit (1974) and Eleventh Circuit (1981), and the United States Supreme Court (1980).

6. There are no disciplinary proceedings pending against Mr. Silver as a member of the bar in any jurisdiction.

7. Mr. Silver has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

8. In further support of this motion, Mr. Silver has submitted herewith his Certificate of Good Standing as Required by Local Rule 83.5.3.

9. Steve I. Silverman is and has been a member in good standing of the bar of the State of Florida since 1985. In addition, Mr. Silverman has also been admitted to practice in the following jurisdictions in the years indicated: United States District Court for the Southern District of Florida (1986), and the United States Court of Appeals for the First Circuit (2003), Third Circuit (1994), Ninth Circuit (1996) and Eleventh Circuit (1986).

10. There are no disciplinary proceedings pending against Mr. Silverman as a member of the bar in any jurisdiction.

11. Mr. Silverman has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

12. In further support of this motion, Mr. Silverman has submitted herewith his Certificate of Good Standing as Required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves that Messrs. Kluger, Silver and Silverman be admitted to practice before this Court *pro hac vice*.

Dated: October 4, 2005

Respectfully submitted,

/s/Theodore M. Hess-Mahan

Theodore M. Hess-Mahan, BBO No. 557109
SHAPIRO HABER & URMYY LLP
53 State Street
Boston, MA 02109
(617) 439-3939

Attorneys for Plaintiff Judy Levin

CERTIFICATE OF GOOD STANDING

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Alan J. Kluger, hereby certify that:

1. I was admitted to the bar of the State of Florida in 1975 and of other jurisdictions as follows:

U.S. District Court, Southern District of Florida	1976
Florida Supreme Court	1975
New York State Bar	1975
U.S. Tax Court	1982
U.S. Court of Appeals, 3rd Circuit	1994
U.S. Court of Appeals, 5th Circuit	1975
U.S. Court of Appeals, 9th Circuit	1997
U.S. Court of Appeals, 11th Circuit	1981
U.S. Supreme Court	1979
District of Columbia	(inactive)
U.S. District Court, Middle District of Florida	(inactive)
U.S. Court of Appeals, 10th Circuit	(inactive)
U.S. Court of Appeals, 2nd Circuit	(inactive)

2. I am a member in good standing in every jurisdiction where I have been admitted practice, other than those indicated as inactive above.
3. No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.
5. My name, firm name, street address, telephone number, fax number and email address are as follows:

Alan J. Kluger
Kluger, Peretz, Kaplan & Berlin, P.L.
201 So. Biscayne Boulevard, 17th Fl.
305-379-9000
305-379-3428
akluger@kpkb.com

Dated: Sept 23, 2005



Alan J. Kluger

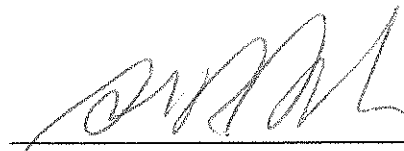
CERTIFICATE OF GOOD STANDING

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Stuart R. Silver, hereby certify that:

1. I was admitted to the bar of the State of Florida in 1974 and of other jurisdictions as follows:

U.S. District Court, Southern District of Florida	1974
U.S. Court of Appeals, 5th Circuit	1974
U.S. Court of Appeals, 11th Circuit	1981
U.S. Supreme Court	1980
U.S. District Court, Middle District of Florida	1982 (inactive)
Pennsylvania Bar	1985 (inactive)
U.S. District Court, Eastern District of Pennsylvania	(inactive)
New York Bar	1985 (inactive)
2. I am a member in good standing in every jurisdiction where I have been admitted practice, other than those indicated as "inactive" above.
3. No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.
5. My name, firm name, street address, telephone number, fax number and email address are as follows:

Stuart R. Silver
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305-379-9000
305-379-3428
ssilver@kpkb.com



Stuart R. Silver

Dated: 9/22/05

CERTIFICATE OF GOOD STANDING

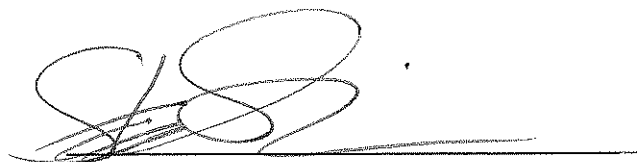
Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Steve I. Silverman, hereby certify that:

1. I was admitted to the bar of the State of Florida in 1985 and of other jurisdictions as follows:

U.S. District Court, Southern District of Florida	1986
U.S. Court of Appeals, 1st District	2003
U.S. Court of Appeals, 3rd Circuit	1994
U.S. Court of Appeals, 9th Circuit	1996
U.S. Court of Appeals, 11th Circuit	1986

2. I am a member in good standing in every jurisdiction where I have been admitted practice.
3. No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.
5. My name, firm name, street address, telephone number, fax number and email address are as follows:

Steve I. Silverman
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Steve I. Silverman

Dated: 9-22-05